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*Attorneys for WC Independence Center*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:
<b>In re</b>	: <b>Chapter 11</b>
	:
<b>SEARS HOLDINGS CORPORATION, et al.,</b>	: <b>Case No. 18-23538 (RDD)</b>
	:
<b>Debtors.<sup>1</sup></b>	: <b>(Jointly Administered)</b>
	:
-----X	

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

COME NOW Marshall C. Turner, Lynn H. Butler and Husch Blackwell LLP (collectively hereafter "HB") and hereby move for leave to withdraw as counsel for WC Independence Center LLC and WC MRP Belleville Center, LLC ("Creditors"). In support of this Motion, HB respectfully states as follows:

1. We do not represent the Debtor(s), a Trustee or any official committees.
2. The Creditors do have matters pending that are associated with this case.
3. The Creditors will obtain substitute counsel and request to have notifications sent to:

Maryann Norwood, Corporate Counsel  
World Class Global Business Services  
814 Lavaca St.  
Austin, TX 78701  
Telephone: (512) 327-3300  
[mnorwood@world-class.com](mailto:mnorwood@world-class.com)

WHEREFORE, Marshall C. Turner, Lynn H. Butler, and Husch Blackwell LLP respectfully request that the Court enter an Order granting them leave to withdraw from their representation of Creditors WC Independence Center LLC and WC MRP Belleville Center, LLC.

Dated May 22, 2019

Respectfully submitted,

/s/ Marshall C. Turner

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/s/ Lynn H. Butler

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of a Motion for Leave to Withdraw as Counsel was provided via the U.S. Bankruptcy Court's CM/ECF system to all parties listed below who receives notice thereby on the 22<sup>nd</sup> day of May, 2019.

/s/ Marshall C. Turner